

1 CLARK COUNTY SCHOOL DISTRICT
2 OFFICE OF THE GENERAL COUNSEL
3 S. SCOTT GREENBERG, ESQ.
Nevada Bar No. 4622
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4 (702) 799-5373
Attorney for Defendant,
5 CLARK COUNTY SCHOOL DISTRICT

6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 ANDRE BATISTE,

9 CASE NO. 2:17-cv-00227-APG-GWF

10 Plaintiff,

STIPULATION TO EXTEND MOTION
DEADLINE

11 v.

(First Request)

12 CLARK COUNTY SCHOOL DISTRICT;
13 JON HOWARD, an individual; DOES
14 I-X, inclusive, and ROE
ENTITIES I-X, inclusive,

Defendants.

15 COME NOW, the parties, by and through their attorneys of
16 record, and hereby stipulate and agree to extend the motion deadline
17 thirty (30) days from the current deadline of February 12, 2018, up
18 to and including March 14, 2018. This is the first request to
19 extend the motion deadline. This request is made in good faith for
20 the reasons described below and not for any reason of delay.

21 The parties completed depositions during the last week of the
22 discovery period and are currently waiting for transcripts from said
23 depositions. Moreover, Plaintiff's counsel contacted defense
24 counsel regarding a potential resolution of the matter at the close
25 of discovery. The parties expect to know whether a resolution is
26 reached within the next 2 weeks. The parties request this
27 extension to allow sufficient time for counsel to fully explore the
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1 recent settlement proposal and to allow for counsel's receipt of the
2 deposition transcripts taken the final week of the discovery period.

3 Therefore, the parties respectfully request that the motion
4 deadline be extended thirty (30) days up to and including March 14,
5 2018.

6 DATED this 19th day of January, 2018.

7 CLARK COUNTY SCHOOL DISTRICT
8 Office of the General Counsel

9 By: /s/ S. Scott Greenberg
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15 Attorney for CCSD

By: /s/ F. Travis Buchanan
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Attorney for Plaintiff

16 **IT IS SO ORDERED:**

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18 Date: 1/22/2018


U.S. MAGISTRATE JUDGE

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